



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

June 07, 2016

Jim Mena, General Manager
Delta Trading
17731 Millux Road
Bakersfield, CA 93311

RE: Failure to Conduct Lead and Copper Tap Sampling – Delta Trading Water System, Water System
No. 1503660
Citation No. 03_19_16C_034

Dear Mr. Mena:

The State Water Resources Control Board (hereinafter State Board), Division of Drinking Water has issued Citation No. 03_19_16C_034, for failure to comply with the provisions of the California Health & Safety Code and Title 22, California Code of Regulations. Specifically, the Delta Trading Water System (hereinafter Water System) failed to conduct initial lead and copper tap sampling which was due February 28, 2015 (first round) and August 2015 (second round). The Citation is **enclosed**. By Directive No. 3 of the Citation, the Water System is required to conduct the first round of initial lead and copper tap sampling (consisting of five samples) by June 30, 2016, second round of initial sampling in December 2016, annual sampling in 2017 and 2018, and then triennial sampling starting from 2021.

The California Safe Drinking Water Act, Section 116577, provides for the State Board to be reimbursed by the public water system for costs incurred for preparing and issuing an enforcement action to that system. Therefore, the Water System has been billed for the preparation and issuance of this citation. The State Board's current billing rate for enforcement activities is \$153 per hour. The hourly rate is subject to review and change upon approval. You will receive a bill for these costs following the end of the State's fiscal year, from our Fee Billing Unit in Sacramento.

If you have any questions regarding this matter, please contact our office at (661) 335-7315.

Sincerely,

Jaswinder S. Dhaliwal, P.E.
Senior Sanitary Engineer, Tehachapi District
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

Enclosure: Citation No. 03_19_16C_034

CC: Kern County Environmental Health Services Department (w/out enclosure)
Greg Bookout, Senior Mechanic, Delta Trading (via email)
McMor Chlorination, Inc., Contract Sampler (via email)

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Attn: Jim Mena, General Manager
Delta Trading
17731 Millux Road
Bakersfield, CA 93311

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS,
TITLE 22, SECTION 64675(b)(2)
LEAD AND COPPER TAP SAMPLING
DELTA TRADING WATER SYSTEM
WATER SYSTEM NO. 1503660
C I T A T I O N N O . 03_19_16C_034
Issued on June 07, 2016**

Section 116650 of the California Health and Safety Code (hereinafter “CHSC”) authorizes the issuance of a citation to a public water system for violation of the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270) (hereinafter “California SDWA”), or any regulation, standard, permit or order issued or adopted thereunder.

1
2 Delta Trading Water System (hereinafter Water System) is classified as a non-transient
3 non-community water system and serves a population of approximately 25 persons through
4 11 service connections. An interim approval letter to operate the Water System was issued
5 by the State Water Resources Control Board, Division of Drinking Water, on January 20,
6 2015.

7
8 The Water System utilizes one groundwater well (Well 03; PS Code: 1503660-001) as its
9 source of domestic water. Arsenic removal treatment is provided to the well water using
10 adsorption. Chlorination treatment is also provided to the well water. . Due to fluoride
11 MCL violation, the Water System is planning to install fluoride removal treatment devices.
12 The State Board will issue a domestic water supply permit to the Water System following
13 installation of fluoride removal treatment.

14
15 The State Water Resources Control Board (hereinafter "State Board"), acting by and
16 through its Division of Drinking Water (hereinafter "Division") and the Deputy Director
17 for the Division (hereinafter "Deputy Director"), hereby issues a citation to Delta Trading
18 Water System (mailing address: 17731 Millux Road, Bakersfield, CA 93311) for failure to
19 comply with the lead and copper tap sampling. Specifically, the Water System has
20 violated the California Code of Regulations (CCR), Title 22, Section 64675(b)(2).

- 21 • Under Provision No. 25 of the Water System's January 20, 2015 interim permit
22 approval letter, the Water System was directed to conduct initial tap sampling for
23 lead and copper by February 28, 2015 at five (5) tap sampling sites to be followed



1 by the second round of initial sampling, within six months of the first round of
2 sampling. As of the writing of this citation, the Water System has failed to conduct
3 initial tap sampling.

- 4 • **Delta Trading Water System has failed to collect first round initial lead and**
5 **copper tap sampling which was due in February 2015, and second round of**
6 **initial lead and copper tap sampling in August 2015 [Section 64675(b)(2),**
7 ***Authorities*].**

8 9 10 **AUTHORITIES**

11
12 **Section 116577 of the CHSC**, states in relevant part:

13 “(a) Each public water system shall reimburse the State Board for the actual costs
14 incurred by the State Board for any of the following enforcement activities related to that
15 water system:

- 16 (1) Preparing, issuing, and monitoring compliance with, an order or citation.
- 17 (2) Preparing, and issuing public notification

18 ...

19 (b) The State Board shall submit an invoice for these enforcement costs to the public
20 water system that requires payment prior to September 1 of the fiscal year following the
21 fiscal year in which the costs were incurred. The invoice shall indicate the total hours
22 expended, the reasons for the expenditure, and the hourly cost rate of the State Board. The
23 costs set forth in the invoice shall not exceed the total actual costs to the State Board of the
24 enforcement activities specified in this section.”...

25
26 **Section 116650 of the California Health and Safety Code** (hereinafter CHSC), states in
27 relevant part:

28 “(a) If the State Board determines that a public water system is in violation of this
29 chapter or any regulation, permit, standard, or order issued or adopted thereunder, the State
30 Board may issue a citation to the public water system. The citation shall be served upon
31 the public water system personally or by certified mail. Service shall be deemed effective
32 as of the date of personal service or the date of receipt of the certified mail. If a person to
33 whom a citation is directed refuses to accept delivery of the certified mail, the date of
34 service shall be deemed to be the date of mailing.

35
36 (b) Each citation shall be in writing and shall describe the nature of the violation or
37 violations, including a reference to the statutory provision, standard, order, citation, permit,
38 or regulation alleged to have been violated.

39
40 (c) A citation may specify a date for elimination or correction of the condition constituting
41 the violation.



1
2 (d) A citation may include the assessment of a penalty as specified in subdivision (e).
3

4 (e) The State Board may assess a penalty in an amount not to exceed one thousand dollars
5 (\$1,000) per day for each day that a violation occurred, and for each day that a violation
6 continues to occur. A separate penalty may be assessed for each violation.”
7

8 **Section 116655 of the CHSC**, states in relevant part:

9 (a) Whenever the State Board determines that any person has violated or is violating
10 this chapter, or any permit, regulation, or standard issued or adopted pursuant to this
11 chapter, the director may issue an order doing any of the following:

- 12 (1) Directing compliance forthwith.
13 (2) Directing compliance in accordance with a time schedule set by the State Board.
14 (3) Directing that appropriate preventive action be taken in the case of a threatened
15 violation.
16

17 (b) An order issued pursuant to this section may include, but shall not be limited to,
18 any or all of the following requirements:

- 19 (1) That the existing plant, works, or system be repaired, altered, or added to.
20 (2) That purification or treatment works be installed.
21 (3) That the source of the water supply be changed.
22 (4) That no additional service connection be made to the system.
23 (5) That the water supply, the plant, or the system be monitored.
24 (6) That a report on the condition and operation of the plant, works, system, or
25 water supply be submitted to the State Board.”
26

27 **Section 64675 of Title 22 of the CCR**, states in relevant part:

28 “(a) During each period, each system shall conduct standard tap sampling by collecting one
29 sample from the number of sites based on the number of people served specified in table
30 64675-A under Standard Tap Sampling.
31

32 (b) During each period, each system conducting reduced tap sampling shall collect at least
33 one sample from the number of sites based on the number of people served specified in
34 table 64675-A under Reduced Tap Sampling, as follows:

- 35 (1) The sites shall be representative of the sites required for standard tap sampling.
36 (2) The samples shall be collected during the months of June, July, August, or
37 September, unless the State Board approves an alternate set of four months based on a
38 review of the system’s operations and lead and copper data, in which case the system shall
39 initiate sampling during the alternate set of four months when directed in writing to do so
40 by the Department, as follows:

- 41 (A) No later than 21 months after the previous period, if sampling annually, or
42 (B) No later than 45 months after the previous period, if sampling triennially.
43
44



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Table 64675-A Lead and Copper Tap Sampling Sites		
System Size	Standard Tap Sampling (Minimum Number of Sites)	Reduced Tap Sampling (Minimum Number of Sites)
>100,000	100	50
10,001 – 100,000	60	30
3301 – 10,000	40	20
501 - 3300	20	10
101 - 500	10	5
<101	5	5

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(c) Sample sites shall be selected pursuant to section 64676 (Sample Site Selection).“

Section 64675.5 of Title 22 of the CCR, states in relevant part:

“(a) A system shall conduct standard tap sampling for two consecutive periods; thereafter, tap sampling frequency may be reduced pursuant to section 64675 (General Requirements for Tap Sampling for Lead and Copper) as follows:

(1) If a system has 90th percentile levels that do not exceed 0.005 mg/L for lead and 0.65 mg/L for copper for two consecutive periods, it may reduce the sampling to once every three years at the reduced number of sites;

(2) For systems that do not meet the criteria in paragraph (1), after two consecutive periods with no action level exceedance, the frequency may be reduced to annually at the reduced number of sites, if the system receives written approval from the based on its review of the system’s data. After sampling for three years (including the initial sampling year) with no action level exceedance, the frequency may be reduced to once every three years at the reduced number of sites, if the system receives written approval from the State Board.”

DETERMINATIONS

Based upon the above *Statement of Facts and Authorities*, the State Board has determined that the Delta Trading Water System has violated the following:

1. CCR, Title 22, Section **64675(a)(2)**; Specifically, the Water System violated the lead and copper tap sampling regulations by failing to conduct two rounds of initial lead and copper tap sampling which was due in February 2015 and August 2015.

The above violations are classified as non-continuing violations.

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DIRECTIVES

Delta Trading Water System is hereby directed to take the following actions:

1. Cease and desist from failing to comply with Section 116555(a) of the California Health and Safety Code (CHSC) and Section 64675(a)(2) of Title 22, California Code of Regulations.
2. By **June 17, 2016**, the Water System shall submit a written response to the State Board acknowledging receipt of the citation and steps it has taken or plan to take to comply with the lead and copper tap sampling.
3. As part of the initial sampling, the Water System shall collect five (5) lead and copper tap samples by **June 30, 2016**, to be analyzed for lead and copper, second round of initial sampling between December 1, 2016 and December 31, 2016, first round of annual sampling between June 1, 2017 and September 30, 2017, second round of annual sampling between June 1, 2018 and September 30, 2018, and triennial sampling afterwards starting 2021, provided there is no exceedance of action level for lead or copper. After conducting each round of monitoring, the Water System shall report the results to the State Board no later than the 10th day of the month following the sampling. A completed Form 141-AR (**Attachment A**) shall be submitted along with the results of each round of sampling.
4. By **June 30, 2016**, provide Tier 2 public notification of the current monitoring and reporting (M&R) violation to the persons served by the Water System, by using the attached template (**Attachment B**).
5. Submit the attached (**Attachment C**) completed *Certification of Completion of Public Notification* Form to the State Board within 10 days of providing the public notification and no later than **July 10, 2016**.

1 6. All submittals required by this Citation shall be submitted to the State Board at the
2 following address:

3
4 Jaswinder S. Dhaliwal, P.E.
5 State Water Resources Control Board
6 Division of Drinking Water, Tehachapi District
7 4925 Commerce Drive, Suite 120
8 Bakersfield, CA 93309
9

10 7. The Water System shall reimburse the State Board, in accordance with an invoice
11 that shall be provided to the Water System, the costs for enforcement activities, and
12 such reimbursement shall be made prior to September 1 (or by a different date if
13 specified by the State Board) of the fiscal year following the fiscal year in which
14 such costs are incurred as described in CHSC Sections 116577(a)(1-2) and
15 116577(b).

16 The State Board reserves the right to make such modifications to the Citation as it may
17 deem necessary to protect public health and safety. Such modifications may be issued as
18 amendments to this Citation and shall be effective upon issuance.

19
20 Nothing in this Citation relieves Delta Trading of its obligation to meet the requirements of
21 the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with Section
22 116270), or any regulation, standard, permit or order issued or adopted thereunder.

23
24 **PARTIES BOUND**

25 This Citation shall apply to and be binding upon the Delta Trading Water System, its
26 owners, shareholders, officers, directors, agents, employees, contractors, successors, and
27 assignees.
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SEVERABILITY

The Directives of this Citation are severable, and the Delta Trading Water System shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Board to: issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the State Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Board; and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Board. The State Board does not waive any further enforcement action by issuance of this Citation.

1 CIVIL PENALTIES

2 Section 116650, subsections (d) and (e) of the CHSC allow for the assessment of a civil
3 penalty for failure to comply with the requirements of the Safe Drinking Water Act.

4 Failure to comply with any provision of this Citation may result in the State Board
5 imposing a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for
6 each day that a violation occurred, and for each day that a violation continues to occur. A
7 separate penalty may be assessed for each violation

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9
10 Jaswinder S. Dhaliwal
11 Jaswinder S. Dhaliwal, P.E.
12 Senior Sanitary Engineer
13 Tehachapi District (#19)
14 State Water Resources Control Board
15 Division of Drinking Water
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17
18
19 June 7, 2016
Date

19 Via Certified Mail No. 7015 1520 0000 4432 2059

20 Attachments

21
22 Attachment A: Lead and Copper Guidance Document along with Form 141-AR
23 Attachment B: Lead and Copper Public Notice Template
24 Attachment C: Certification of Completion of Public Notification Form
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26
27 CC: Kern County Environmental Health Services Department (w/o attachments)
28 Greg Bookout, Senior Mechanic, Delta Trading
29 McMor Chlorination, Inc., Contract Sampler (via email)

Attachment A

Lead and Copper Guidance Document and Form 141-AR

Lead and Copper Rule Sampling Guidance

For Water Systems Serving Population up to 10,000

Prepared by: State Water Resources Control Board, Division of Drinking Water
Southern California Drinking Water Field Operations Branch
Tehachapi District
4925 Commerce Drive, Suite 120
Bakersfield, CA 93309
Phone: (661) 335-7315 / FAX: (661) 335-7316

This guidance document was developed to help water systems comply with the California Lead and Copper Rule. The Lead and Copper Rule requires community and nontransient-noncommunity water systems to monitor lead and copper levels at the consumers' taps. If action levels are exceeded, installation of corrosion control treatment is required. If the action level for lead is exceeded, public notification is required.

Lead Action Level = 0.015 mg/L

Copper Action Level = 1.3 mg/L

Compliance with the lead and copper action levels is based on the 90th percentile lead and copper levels. This means that the concentration of lead and copper must be less than or equal to the action level in at least 90% of the samples collected.

To help explain how to comply with the California Lead and Copper Rule, information on the following topics is included in this document:

- Section 1 - Number of Tap Sample Sites Required
- Section 2 - When to Sample
- Section 3 - Where to Sample
- Section 4 - How to Sample
- Section 5 - How to Calculate the 90th Percentile Lead and Copper Levels
- Section 6 - What to Do if You Exceed the Lead or Copper Action Level
- Section 7 - How to Report Your Sample Results
- Section 8 - Monitoring Waivers (Applicable Only to Systems Serving 3,300 or Fewer Persons)

Attachments to this document include:

1. "Homeowner Tap Sample Collection Procedures"
2. "Lead and Copper Results Worksheet"
3. Form 141-AR "Lead and Copper Rule Sampling Report"

Section 1. Number of Tap Sample Sites Required

The number of tap sample sites required is shown in Table 1, and is based on the population served by your water system and if you are performing Standard or Reduced Monitoring.

Table 1. Minimum Number of Tap Sample Sites Required

System Population	Minimum Number of Tap Sample Sites	
	Standard Monitoring	Reduced Monitoring
3,301 to 10,000	40	20
501 to 3,300	20	10
101 to 500	10	5
Less than 101	5	5

Section 2. When to Sample

- **Standard Monitoring:**

Each water system must complete at least two consecutive 6-month Standard Monitoring periods with no exceedance of the lead or copper action level before the frequency of sampling can be reduced. During each 6-month Standard Monitoring period, you must collect at least one tap sample from the number of sites shown in Table 1 under Standard Monitoring.

Therefore, during your first year of sampling, collect a set of samples in the first six months and a set of samples in the second six months. Samples must be analyzed for both lead and copper.

If at any time your 90th percentile lead or copper level exceeds the action level, you must contact this office for further guidance.

- **Reduced Monitoring:**

If you have completed two consecutive 6-month Standard Monitoring periods and the 90th percentile levels do not exceed 0.005 mg/L for lead and 0.65 mg/L for copper, you may reduce the number of tap sample sites as shown in Table 1, under Reduced Monitoring, and reduce the frequency at which you sample to once every three years.

If you have completed two consecutive 6-month Standard Monitoring periods and the 90th percentile levels are greater than 0.005 mg/L for lead and 0.65 mg/L for copper, but do not exceed the lead or copper action levels, you may reduce the number of tap sample sites as shown in Table 1, under Reduced Monitoring. You may also reduce the frequency at which you collect the samples to annual monitoring for two more years.

In the second and third years of sampling, collect one set of samples during the month of June, July, August or September. Samples must be analyzed for both lead and copper. After completing the third year of sampling, if there has been no exceedance of the lead or copper action level, collect one set of samples every three years during the month of June, July, August or September. Again, samples must be analyzed for both lead and copper.

If at any time your 90th percentile lead or copper level exceeds the action level, you must contact this office for further guidance.

Section 3. Where to Sample

- Notes:
1. If lead service lines are present in the distribution system, at least half of the samples must come from the sites served by lead service lines.
 2. Do not sample from homes or buildings that have point-of-use treatment (e.g., water softener, carbon filter system, etc.).
 3. Each round of sampling should be conducted at the same sampling sites. If an original sampling site is not available, you should collect a tap sample from another site meeting the same Tier criteria as the original site.

- **Community Water Systems:**

Lead and copper tap samples must be collected from sampling locations that meet the following criteria:

Tier 1 - Single-family structures that contain:

- a) Lead pipes or
- b) Copper pipes with lead solder installed after 1982 or
- c) Pipes served by lead service lines.

If there are not enough Tier 1 sites available, samples must meet the following criteria:

Tier 2 - Buildings and multiple-family residences that contain:

- a) Lead pipes or
- b) Copper pipes with lead solder installed after 1982 or
- c) Pipes served by lead service lines.

If there are not enough Tier 1 and Tier 2 sites available, samples must meet the following criteria:

Tier 3 - Single-family structures that contain copper pipes with lead solder installed before 1983.

If there are not enough Tier 1, Tier 2, and Tier 3 sites available, samples must be collected from representative sites (i.e., plumbing materials commonly found at other sites) throughout the distribution system.

- **Nontransient-Noncommunity Water Systems:**

Lead and copper tap samples must be collected from sampling locations that meet the following criteria:

Tier 1 - Buildings that contain:

- a) Lead pipes or
- b) Copper pipes with lead solder installed after 1982 or
- c) Pipes served by lead service lines.

If there are not enough Tier 1 sites available, samples must meet the following criteria:

Tier 2 - Buildings that contain copper pipes with lead solder installed before 1983.

If additional sites are needed to complete the sampling pool, samples must be collected from representative sites.

Section 4. How to Sample

Depending on the type of water system you operate, the following options are available for sample collection:

- a) You can collect the samples yourself using the procedures outlined below, or
- b) Residents of the water system can collect the samples for you. Letters are usually sent to find volunteers to participate in the sampling program. The attached sample collection instruction sheet must be sent to each participant. Residents collect the samples and complete the bottom portion of the instruction sheet. You collect the filled sample bottles and the completed instruction sheets from the residents. Sample bottles are then transported to the laboratory for analysis.

Sample Procedures:

- 1) Samples from residential housing are to be taken from a kitchen or bathroom cold-water faucet. Do not sample from faucets that have point-of-use treatment (e.g., water softener, carbon filter system, etc.). Samples from a non-residential building are to be collected from an interior tap from which water is typically drawn for consumption.
- 2) Each sample must be collected after the water has stood undisturbed in the pipes for at least 6 hours, but not more than 12 hours. It is best to collect the sample first thing in the morning.
- 3) Each sample must be one liter in volume and must contain the first water drawn from the faucet.
- 4) Remove the cap from the one-liter sample bottle, place the container directly below the faucet and gently open the cold-water tap. Fill the sample bottle to the line marked "1-liter or 1,000-ml" and turn off the water.

Tightly cap the sample bottle and complete the required information on the sample bottle label.
- 5) All samples must be analyzed by a laboratory certified by the State to perform drinking water lead and copper analyses.

Section 5. How to Calculate the 90th Percentile Lead and Copper Levels

Complete the attached "Lead and Copper Results Worksheet". If your 90th percentile lead level is greater than 0.015 mg/l, you have exceeded the action level. If your 90th percentile copper level is greater than 1.3 mg/l, you have exceeded the action level.

Section 6. What to Do if You Exceed the Lead or Copper Action Level

If your 90th percentile lead or copper level exceeds the action level, you must contact this office for further guidance.

Section 7. How to Report Your Sample Results

Upon completion of each sampling period, the following items must be submitted to the Tehachapi District Office, Southern California Drinking Water Field Operations Branch, State Water Resources Control Board-Division of Drinking Water:

- 1) A fully completed Form 141-AR (copy attached).
- 2) Laboratory copies of all sample results.
- 3) Completed "Lead and Copper Results Worksheet".

Section 8. Monitoring Waivers (Applicable Only to Systems Serving 3,300 or Fewer Persons)

If your water system serves 3,300 or fewer people, you may apply to the Department for a waiver to reduce the tap sampling frequency for lead and copper to once every **nine** years. If you meet the following materials and monitoring criteria for both lead and copper, a full waiver will be granted. If you meet the materials and monitoring criteria for only one of the chemicals, a partial waiver that covers only that chemical will be granted.

- **Materials Criteria:**

You must provide certification and documentation that the distribution system and service lines and all drinking water supply plumbing, including plumbing conveying drinking water within all residences and buildings connected to the system, satisfy the following:

For lead, the system must be free of plastic pipes that contain lead plasticizers or plastic service lines that contain lead plasticizers, lead service lines, lead pipes, lead-soldered pipe joints, and leaded brass or bronze alloy fittings and fixtures, unless you can demonstrate that such fittings and fixtures will not leach lead into the drinking water.

For copper, the system must be free of copper pipes and copper service lines.

- **Monitoring Criteria:**

You must have conducted standard tap sampling for at least one six-month period and demonstrate that the 90th percentile levels for all periods of tap sampling conducted since the water system became free of all lead-containing and/or copper-containing materials do not exceed 0.005 mg/L for lead and 0.65 mg/L for copper. You must continue monitoring at the required frequency (Standard Monitoring or Reduced Monitoring) until a waiver is granted.

Homeowner Tap Sample Collection Procedures

These samples are being collected to determine the lead and copper levels in your tap water. This sampling effort is required by the U.S. Environmental Protection Agency and your state, and is being accomplished through the cooperation of homeowners and residents.

Tap Sample Collection Procedures:

- 1) Prior arrangements will be made to coordinate the sample collection event. Dates will be set for sample bottle delivery and pick-up by water system staff.
- 2) Samples are to be taken from a kitchen or bathroom cold-water faucet. Do not sample from faucets that have point-of-use treatment (e.g. water softener, carbon filter system, etc.).
- 3) Each sample must be collected after the water has stood undisturbed in the pipes for a minimum of 6 hours, but not more than 12 hours. Due to this requirement, it is best to collect the sample first thing in the morning.
- 4) Each sample must be one liter in volume and must contain the first water drawn from the faucet.
- 5) Remove the cap from the one-liter sample bottle, place the container directly below the faucet and gently open the cold-water tap. Fill the sample bottle to the line marked "1 liter or 1000-ml" and turn off the water.

Tightly cap the sample bottle and complete the required information on the sample bottle label. If the label has been partially completed for you, verify that the information is correct.

- 6) If any plumbing repairs or replacement has been done in the home since the previous sampling event, note this information below.
- 7) Complete the bottom portion of this instruction sheet.
- 8) Place the sample bottle and instruction sheet outside of the residence (in the same location as delivery) so they can be retrieved by water system staff.
- 9) Results of the sampling will be provided to the participants.

If you have any questions regarding these directions, call:

Contact Name

Water System Name

Phone Number

To Be Completed By Resident

Sample collection address: _____

Water was last used: Time _____ Date _____

Sample was collected: Time _____ Date _____

Plumbing repairs or replacement since last sampling event? _____

I have read the above directions and have taken a sample in accordance with these directions.

Signature

Date

Lead and Copper Results Worksheet

System Name: _____

Sample Date(s): _____

Determine the 90th percentile lead and copper levels:

1. List all of the samples in Table 2 on the following page.
2. Circle the highest five values for both lead and copper.
3. Determine the 90th percentile lead level by following the instructions given in Table 1.

Write down the 90th percentile level for lead = _____ mg/L

If the 90th percentile lead level is greater than 0.015 mg/L, you have exceeded the action level.

4. Determine the 90th percentile copper level by following the instructions given in Table 1.

Write down the 90th percentile level for copper = _____ mg/L

If the 90th percentile copper level is greater than 1.3 mg/L, you have exceeded the action level.

Table 1 - Determining the 90th Percentile Lead or Copper Level

Number of Tap Samples Collected	How to Determine the 90 th Percentile Lead or Copper Level
5 to 7	Average the two highest sample results to get the 90 th percentile level.
8 to 12	The 90 th percentile level is the second highest sample result.
13 to 17	Average the second and third highest sample results to get the 90 th percentile level.
18 to 22	The 90 th percentile level is the third highest sample result.
38 to 42	The 90 th percentile level is the fifth highest sample result.

Table 2 - Sample Results

	Sample Address	Lead Level (mg/L)	Copper Level (mg/L)
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LEAD AND COPPER RULE SAMPLING REPORT

System's Name: _____

Type: ☐ CWS ☐ NTNCWS

Address: _____

Size: ☐ >100,000☐ 50,001 to 100,000☐ 10,001 to 50,000☐ 3,301 to 10,000☐ 501 to 3,300☐ 101 to 500☐ ≤ 100

Telephone Number: _____

System ID Number: _____

Contact Person: _____

Sample
Date(s): _____

SAMPLE SITE IDENTIFICATION

Number of sample sites in each category:

- Single-family structures with copper pipes with lead solder installed after 1982 or lead pipes or lead service lines _____
- Multi-family structures with copper pipes with lead solder installed after 1982 or lead pipes or lead service lines _____
- Buildings containing copper pipes with lead solder installed after 1982 or lead pipes or lead service lines _____
- Single family structures with copper pipes with lead solder installed before 1983 _____

Total: _____

Number of lead service lines present in the distribution system: _____

Number of samples collected from sites served by lead service lines: _____

The following sources have been explored to determine the number of structures that have interior lead pipe or copper pipe with lead solder:

- | | |
|--|---|
| <input type="checkbox"/> Plumbing and/or building codes | <input type="checkbox"/> Interviews with building inspectors |
| <input type="checkbox"/> Plumbing and/or building permits | <input type="checkbox"/> Survey of service area plumbers about when and where lead solder was used from 1982 to present |
| <input type="checkbox"/> Contacts with the building department, municipal clerk's office, or state regulatory agencies | <input type="checkbox"/> Survey of residents |
| <input type="checkbox"/> Water quality data | <input type="checkbox"/> Interviews with local contractors & developers |

The following sources have been explored to determine the number of lead service lines in the distribution system:

- ☐ Distribution system maps and record drawings
- ☐ Capital improvement plans and/or master plans for distribution system development
- ☐ Standard operating procedures and/or operation & maintenance manuals for the types of materials used for service connections
- ☐ Utility records including meter installations, customer complaint investigations
- ☐ Water quality data
- ☐ Interviews with senior personnel
- ☐ Conduct service line sampling where lead service lines are suspected to exist
- ☐ Review of permit files
- ☐ Survey of residents
- ☐ Interviews with local pipe supplies, contractors and/or developers

RESULTS OF SAMPLING

Results of Lead And Copper Tap Water Samples: *(Attach copy of all results to this form.)*

 Number of tap samples required: _____ 90th Percentile Lead Level: _____ mg/L

 Number of tap samples collected & submitted: _____ 90th Percentile Copper Level: _____ mg/L

Results of Water Quality Parameter (WQP) Samples: *(Complete only if system is required to collect WQP samples.)*

Number of WQP samples required to be collected: _____

Number of WQP samples collected & submitted: _____

Number of WQP entry point samples required to be collected: _____

Number of WQP entry point samples collected and submitted: _____

CERTIFICATION OF COLLECTION METHODS

I certify that:

- Each first draw tap sample for lead and copper is one liter in volume and has stood motionless in plumbing system of each sampling site for at least six hours.
- Each first draw sample collected from a single-family residence has been collected from the cold-water kitchen tap or bathroom sink tap.
- Each first draw sample collected from a non-residential building has been collected at an interior tap from which water is typically drawn for consumption.
- Each first draw sample collected during an annual or triennial monitoring period has been collected in months of June, July, August, or September.
- Each resident who volunteered to collect tap water samples from his or her home has been properly instructed in the proper methods for collecting lead and copper samples. I do not challenge the accuracy of those sampling results.
- Enclosed is a copy of the material distributed to residents explaining the proper collection methods, and a list of the residents who performed sampling.

CHANGE OF SAMPLING SITES

Original site address: _____

New site address: _____

Distance between sites (approximately): _____

Targeting Criteria:	New Site:	<input type="checkbox"/> Tier 1 <input type="checkbox"/> Tier 2 <input type="checkbox"/> Tier 3	Old Site:	<input type="checkbox"/> Tier 1 <input type="checkbox"/> Tier 2 <input type="checkbox"/> Tier 3
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Reason for sample site change:

SIGNATURE:
DATE:

Print Name

Title

Attachment B

Lead and Copper Public Notice Template

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.
Tradúzcalo o hable con alguien que lo entienda bien.

Lead and Copper Tap Sampling Monitoring Requirements Not Met for Delta Trading Water System

Delta Trading Water System has failed to monitor as required for a drinking water monitoring standard during the calendar year 2015 and therefore was in violation of the monitoring and reporting regulations. As our customers, you have a right to know what you should do, what happened and what are doing to correct this situation.

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During the calendar year 2015, we did not conduct monitoring for lead and copper tap sampling and therefore cannot be sure of the quality of our drinking water during that time.

What should I do?

- There is nothing you need to do at this time.
- The table below lists the contaminant we did not properly test for during 2015; how many samples we are required to take and how often, how many samples we took when samples should have been taken, and the date on which the most recent nitrate samples were taken.

Required Number of Distribution Sites	Contaminants	Required sampling frequency	Number of samples taken	Last sample date
5	Lead and Copper	Two rounds of Initial Sampling (every 6 months) Due Feb. 2015 & Aug. 2015	0 (None)	none

- If you have health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What is being done?

We have been directed by the State Water Resources Control Board to collect the required first round of initial lead and copper tap samples in June 2016, second round of initial samples in December 2016, and continued sampling afterwards, as required by Title 22, California Code of Regulations. We plan to collect the samples, as directed. For more information, please contact Jim Mena, General Manager at 661-834-5560.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Date Distributed & Posted: _____

Jim Mena, General Manager
Delta Trading Water System (1503660)

Attachment C

Certification of Completion of Public Notification Form

Certification of Completion of Public Notification
(Include a Copy of Public Notice with the Certification of Public Notification)

This form, when completed and returned to the Division of Drinking Water – Tehachapi District (4925 Commerce Drive, Suite 120, Bakersfield, CA 93309 or fax to 661-335-7316), serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

Public Water System Name: Delta Trading Water System

Public Water System No.: 1503660

Public notification for **failure to comply with the Lead and Copper Initial and Annual Tap Sampling for Calendar year 2015** was performed by the following method(s) (check and complete those that apply):

- ☐ The notice was mailed to users on: _____
A copy of the notice is attached.
- ☐ The notice was hand delivered to water customers on: _____
A copy of the notice is attached.
- ☐ The notice was published in the local newspaper on: _____
A copy of the newspaper notice is attached.
- ☐ The notice was posted at conspicuous places on: _____
A copy of the notice is attached.
A list of locations the notice was posted is attached.
- ☐ The notice was delivered to community organizations on: _____
A copy of the notice is attached.
A list of community organizations the notice was delivered to is attached.

I hereby certify that the above information is factual.

Printed Name

Title

Signature

Date

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for separate violation each day that the violation continues. In addition, the violators may be prosecuted in criminal court and, upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in the county jail not to exceed one year, or by both the fine and imprisonment.

Due to the Division of Drinking Water within 10 days of issuance of notice to customers and no later than July 10, 2016

Enforcement Action No. 03-19-16C-034